

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
JOHN RICHARD DAE, Plaintiff
VS.
DR. ROBERT CLARK et al., Defendants.

Civil Action No. 00-cv-01090
12/15/00

U.S. District Judge Ram
Magistrate Judge Smoyer

FILED
HARRISBURG

DEC 14 2000

MARY E. D'ANDREA, CLERK
Per _____
DEPUTY CLERK

MOTION FOR LEAVE TO FILE PLAINTIFF'S BRIEF
OPPOSITION TO CORRECTIONS DEFENDANTS' MOTION
REVOKE PLAINTIFF'S IN FORMA PAUPERIS STATUS AND
TO DEFER FILING OF RESPONSIVE PLEADING TO PLAINTIFF'S
AMENDED COMPLAINT WHICH EXCEEDS FIFTEEN (15) PAGE LIMIT AND BRIEF IN SUPPORT

COMES NOW, the Plaintiff and Pro Se Counsel in the above entitled
Civil Action, John Richard Dae, as a layman Unlettered in the Arts
Sciences of the Laws & Legal Procedures within the United States,
now files his Motion For leave to file Plaintiff's Brief In Opposition
To Corrections Defendants' Motion To Revoke Plaintiff's In Forma
Pauperis Status And To Defer Filing Of Responsive Pleading To
Plaintiff's Amended Complaint Which Exceeds Fifteen (15) Page
Limit And Brief In Support, herein, who avers, deposes & states:

I. The Motion

1. For & based upon the reasons & arguments set forth
herein, infra, Plaintiff John Richard Dae, moves this court, pursuant
to M.D.L.R. 7.8, for an order granting him leave to file his BRIEF
In Opposition To Corrections Defendants' Motion To Revoke Plaintiff's

In Forma Pauperis Status And To Defer Filing of Response
fleadding To Plaintiff's Amended Complaint which
Exceeds Fifteen (15) Page Limit, herein this Civil Action.

II. BRIEF TO SUPPORT

Plaintiff avers & submits, that M.D. LR 7-8 read
that: "No brief exceeding fifteen (15) pages shall be filed
without prior authorization. Any motion for such authorization
shall specify the length of brief requested and shall be filed
at least two (2) working days before the brief is due.

Pursuant to M.D. LR 7-8, Plaintiff avers & submits
that he requests authorization to file a brief which
is thirty (30) pages in length, herein this case.

This Court and the parties will benefit from a more
extensive argument than can be accomplished in just fifteen (15) pages.

This Court has allowed this Plaintiff
to file Briefs longer than
fifteen (15) pages in his other
CIVIL RIGHTS ACTIONS/CASES
pending before this Court & should likewise do
so herein this case.

The interests of justice & fundamental fairness
will best be served by allowing this Plaintiff to file a
Brief, herein this case, which is thirty (30) pages in length.

Plaintiff has enough paper & will not need another enlargement of time to file this brief, herein:

(W)HEREFORE, Plaintiff John Richard Jae, prays that this court will enter an order granting him leave to file his brief in opposition to Corrections Defendants' motion to reverse Plaintiff's in forma pauperis status and to defer filing of responsive pleading to Plaintiff's Amended Complaint, herein the case which is thirty (30) pages in length:

AND HE SHALL EVER PRAY
RESPECTFULLY SUBMITTED,

(S) John Richard Jae
MR. JOHN RICHARD JAE,
Plaintiff and Pro Se Counsel

Dated: 11th DECEMBER 2000

MR. John Richard Jae,
BQ-3219

SCT-GC/SMU

175 Progress Drive

Waynesburg, PA 15370

Dae vs. Clark et al.
CIV No. 1-CK-00-1090

CERTIFICATE OF SERVICE

I, John Richard Dae, hereby certify that I on the
11th day of December, 2000, serving a true & correct
Carbon Copy of the Plaintiff's Motion for ~~Leave to~~ ~~Opposition to Defendants' Motion to~~
~~Revise Plaintiff's Amended Complaint~~
File Plaintiff's Brief in opposition to Defendants' Motion to Revoke Plaintiff's Inform
PAUPERS status and to Deny Plaintiff's Amended Complaint which
Exceeds Fifteen (15) Page Limit and Brief, ~~copy~~
By 1st Class Mail, Postage Pre-Paid & addressed to

MR. JAMES D. YOUNG, Esquire
(CAVERY, FAHERTY, YOUNG & PATERSON), P.C.
Attorneys at Law
P.O. Box 1245
Harrisburg, PA 17108-1245

MR. Robert M. Waller,
Ass't. Counsel
Pa. Dept. of Corrections
Off. of Chf. & Cnsl
55 Cherry Dr.
Camp Hill, PA 17011

Dated/Executed on:
11th December 2000
At: Waynesburg, Pennsylvania

(S) John Richard Dae
MR. John Richard Dae
Plaintiff's Esq. Cnsl